

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JOHN PIERRE DUPONT,
a/k/a "John Gary Rinaldo,"
a/k/a "John Gary,"

Defendant.

SEALED
INDICTMENT

19 Cr. ____

19 CRIM 444

COUNT ONE
(Wire Fraud)

The Grand Jury charges:

1. From in or about 2015, up to and including in or about March 2019, in the Southern District of New York and elsewhere, JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, DUPONT perpetrated a scheme to obtain money from victims who were led to believe they were donating to political campaigns and/or political action committees supportive of particular campaigns or causes, when in

truth and in fact the donated money was used to enrich DUPONT and to further the fraudulent fundraising scheme.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT TWO
(Aggravated Identity Theft)

The Grand Jury further charges:

2. From in or about 2015, up to and including in or about March 2019, in the Southern District of New York and elsewhere, JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," the defendant, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, DUPONT used, transferred, and possessed the names of other individuals, including the names of certain candidates for elective political office, during and in relation to the offense charged in Count One of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1),
1028A(b), and 2.)

FORFEITURE ALLEGATION

3. As a result of committing the offense alleged in Count One of this Indictment, JOHN PIERRE DUPONT, a/k/a "John Gary Rinaldo," a/k/a "John Gary," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code Section 981(a)(1)(C) and Title 28, United States Code Section

2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to the commission of the offense charged in Count One of this Indictment.

SUBSTITUTE ASSETS PROVISION


4. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

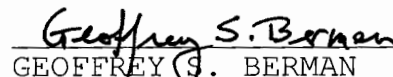
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, 981(a)(1)(C), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c),

to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

(Title 18, United States Code, Section 981(a)(1)(C),
Title 21, United States Code, Section 853(p),
Title 28, United States Code, Section 2461(c).)



FOREPERSON

GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(18 U.S.C. §§ 1343, 1028A, and 2.)

GEOFFREY S. BERMAN
United States Attorney


Foreperson

06/13/19

(CA)

SEALED INDICTMENT FILED
W/ ARREST WARRANTS

KH PARKER

USMS